

Exhibit BB

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Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**DECLARATION OF [REDACTED] IN
SUPPORT OF RESPONSE TO FOLLOW-
UP QUESTIONS RE DIXIE AND FLY
FIRES, QUESTIONS 7 THROUGH 36**

Judge: Hon. William Alsup

1 I, [REDACTED] hereby declare under penalty of perjury as follows:

2 1. I make this declaration based upon personal knowledge, and if called as a
3 witness, I could and would testify competently to the matters set forth herein.

4 2. I am a Senior Consulting Electrical Engineer in the Applied Technology
5 Services Department, the testing and failure analysis laboratory at Pacific Gas and
6 Electric Company ("PG&E").

7 3. One type of fuse used by PG&E is the S&C SMU-20 power fuse. This fuse
8 is identified on page 86 of the 2021 edition of the California Power Line Fire Prevention
9 Field Guide issued by CalFire and the California Public Utilities Commission as
10 permanently exempt equipment from the requirements of California Public Resources
11 Code section 4292.

12 4. In the course of my duties at PG&E, I have become aware of instances of
13 the S&C SMU-20 power fuse failing to operate properly due to water entering the fuse
14 and causing swelling of the solid arc-extinguishing boric acid compound inside the fuse
15 tube. As a result, the fuse may not terminate the fault condition within the design
16 timeframe, and the fuse may continue arcing internally. This failure to operate properly
17 has resulted at times in the fuse itself heating up and igniting.

18 5. In January of 2020, the company issued a Utility Bulletin regarding this
19 issue and the proper storage, handling, and other steps to take in order to avoid water
20 entering the fuse. The company is continuing to review this issue. I participated in the
21 development of the Utility Bulletin, and I am participating in the ongoing review.

22
23 I declare under penalty of perjury under the laws of the United States and the
24 State of California that the foregoing is true and correct to the best of my knowledge.

25 Executed this 30th day of August, 2021, in the City of Richmond, County of Contra
26 Costa, State of California. [REDACTED]

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